

1 YI-CHIN HO (CA SBN 204834)
2 yi-chin.ho@hugheshubbard.com
3 HUGHES HUBBARD & REED LLP
4 1999 Avenue of the Stars, 9th Floor
5 Los Angeles, CA 90071
6 Telephone: (213) 613-2800
7 Fax: (213) 613-2950

8 Attorneys for Defendants
9 MAXEON SOLAR TECHNOLOGIES, LTD.,
10 WILLIAM MULLIGAN, and KAI
11 STROHBECKE

12
13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA

15 JEYAKUMAR VS MENON, Individually
16 and on Behalf of All Others Similarly
17 Situated,

18 Plaintiff,

19 vs.

20 MAXEON SOLAR TECHNOLOGIES,
21 LTD., WILLIAM MULLIGAN, and KAI
22 STROHBECKE,

23 Defendants.

24 CASE NO. 3:24-CV-03869-EMC

25 **JOINT STIPULATION AND [PROPOSED]**
26 **ORDER EXTENDING DEFENDANTS'**
27 **TIME TO RESPOND TO THE SECOND**
28 **AMENDED COMPLAINT**

1 WHEREAS, on November 8, 2024, Plaintiff Jeyakumar VS Menon (“Plaintiff”) filed an
2 amended class action complaint (ECF No. 66);

3 WHEREAS, on December 20, 2024, Defendants Maxeon Solar Technologies, Ltd.
4 (“Maxeon”), William Mulligan, and Kai Strohbecke (collectively “Defendants”, and together with
5 Plaintiff, the “Parties”) filed a motion to dismiss the amended class action complaint (*See* ECF Nos.
6 70-72);

7 WHEREAS, on April 28, 2025, the Court entered an Order Granting Defendants’ Motion to
8 Dismiss Plaintiff’s Amended Class Action Complaint with leave for Plaintiff to file a second amended
9 complaint within four weeks of the order and, if a second amended complaint was filed, permitting
10 Defendants to have four weeks thereafter to file a response (ECF No. 90);

11 WHEREAS, on May 27, 2025, Plaintiff filed the Second Amended Class Action Complaint
12 against Defendants (ECF No. 91, “the Second Amended Complaint”);

13 WHEREAS, Defendants have recently retained new counsel;

14 THEREFORE, in light of the foregoing, the Parties hereby stipulate, and respectfully request
15 the Court to order, as follows:

16 1. Defendants shall have until July 11, 2025, to file and serve their response to the Second
17 Amended Complaint;

18 2. To the extent Defendants file a motion to dismiss the Second Amended Complaint,
19 Plaintiff shall file and serve any response in opposition to Defendants’ motion to dismiss by August
20 8, 2025, and Defendants shall file and serve any reply by August 22, 2025.

21 3. Nothing in this Stipulation is intended in any way to waive or affect any rights, claims,
22 defenses, objections or arguments that any party may have with respect to any matter, other than those
23 expressly addressed and agreed to in paragraphs 1 through 2 above.

24 IT IS SO STIPULATED.

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2 DATED: June 20, 2025

/s/ Yi-Chin Ho

 Yi-Chin Ho (CA SBN 204834)
 HUGHES HUBBARD & REED LLP
 1999 Avenue of the Stars, 9th Floor
 Los Angeles, CA 90071
 Telephone: (213) 613-2800
 Fax: (213) 613-2950
 Email: yi-chin.ho@hugheshubbard.com

6 *Attorney for Defendants MAXEON SOLAR*
 7 *TECHNOLOGIES, LTD., WILLIAM MULLIGAN, and*
KAI STROHBECKE

8
 9 */s/James M. Wilson Jr.*
 10 _____
 11 James M. Wilson, Jr. (*pro hac vice*)
 FARUQI & FARUQI, LLP
 12 685 Third Avenue, 26th Floor
 New York, NY 10017
 Telephone: 212-983-9330
 Facsimile: 212-983-9331
 Email: jwilson@faruqilaw.com

13
 14 Robert W. Killorin (*pro hac vice*)
 FARUQI & FARUQI, LLP
 15 3565 Piedmont Road NE
 Building Four, Suite 380
 Atlanta, GA 30305
 Telephone: 404-847-0617
 Facsimile: 404-506-9534
 Email: rkillorin@faruqilaw.com

16
 17 Lisa Tamiko Omoto (CA SBN 303830)
 Faruqi & Faruqi, LLP
 18 1901 Avenue of the Stars, Suite 1060
 Los Angeles, CA 90067
 Telephone: (424) 365-3225
 Email: lomoto@faruqilaw.com

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 21
 22 *Attorneys for Lead Plaintiff JEYAKUMAR VS MENON*
 and *Lead Counsel for the putative class*

1 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(I)(3)**

2 I, Yi-Chin Ho, attest that concurrence in the filing of this document has been obtained from
3 the other signatories.

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5 DATED: June 20, 2025

/s/ Yi-Chin Ho
Yi-Chin Ho

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1 **[PROPOSED] ORDER**
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

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5 DATED: June 20, 2025


6 The Honorable Edward M. Chen
7 United States District Judge
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